

JP:SCJ

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

VICTOR LARSEN,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

CLARENCE EVERETT, being duly sworn, deposes and states that he is a Detective with the New York City Police Department ("NYCPD"), assigned to the Federal Bureau of Investigation ("FBI")/NYCPD Joint Bank Robbery Task Force, duly appointed according to law and acting as such.

Upon information and belief, on or about December 20, 2010, within the Eastern District of New York, the defendant VICTOR LARSEN did knowingly, intentionally take by force, violence and intimidation, from the person and presence of another, money belonging to and in the care, custody, control, management and possession of a bank or other financial institution, to wit, Chase Bank, the deposits of which are insured by the Federal Deposit Insurance Corporation, and, in so doing, put in danger the life of a person by the use of a dangerous weapon.

(Title 18, United State Code, Section 2113(d))

M11-0271

COMPLAINT AND
AFFIDAVIT IN SUPPORT
OF ARREST WARRANT

(T. 18 U.S.C. § 2113(d))

The source of your deponent's information and the grounds for his belief are as follows:¹

1. Your deponent has been a Detective with the NYCPD for approximately 13 years, and assigned to the Joint Bank Robbery Task Force for approximately 5 years. I am familiar with the facts contained in this affidavit as a result of my participation in the investigation of the bank robbery discussed in this affidavit, which includes, but is not limited to, my review of bank robbery surveillance photographs, interviews with witnesses, an interview with the defendant VICTOR LARSEN, and conversations with other law enforcement personnel assisting with the investigation.

2. On or about December 20, 2010, a man, as detailed further below, later identified as the defendant VICTOR LARSEN, robbed Chase Bank, located at 47-11 Queens Boulevard, Sunnyside, New York. Specifically, LARSEN entered the bank and approached a bank teller window at approximately 11:08 a.m. According to the bank teller, LARSEN approached the teller window and handed the teller a demand note, which read "I HAVE A GUN GIVE ME THE LOOSE 100s ONLY NOW OR PEOPLE WILL DIE." LARSEN told the teller "Don't give me the 20s, give me the 100s." The teller also observed

¹ Because this affidavit is being submitted for the limited purpose of establishing probable cause to arrest the defendant, I have not included details of every aspect of this investigation.

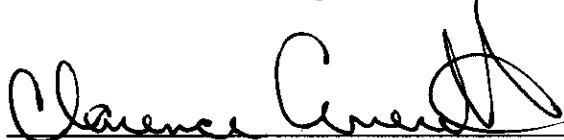
what she believed to be a gun in LARSEN's waistband. The teller gave LARSEN all the hundred bills from her top drawer, totaling approximately \$10,000. After collecting the money, LARSEN fled the bank and the bank teller sounded the bank's hold-up alarm.

3. On or about December 22, 2010, the NYCPD analyzed the demand note from the December 20, 2010 Chase robbery. While no usable fingerprints were found on the note, the NYCPD determined that the demand note was similar to demand notes collected from bank robberies committed by the defendant VICTOR LARSEN in 2008. I then compared LARSEN's photograph to the surveillance photographs from the December 20, 2010 bank robbery and determined that it appeared to be the same person. I also learned that LARSEN was released from federal custody on December 7, 2010 and had failed to report to the United States Probation Department as required.

4. On or about January 5, 2011, the defendant VICTOR LARSEN was arrested by NYCPD after he was caught shoplifting a DVD from a Best Buy located in New York, New York. The arresting officer thought he recognized LARSEN from a Wanted Poster and he requested that LARSEN produce valid identification. At that point, LARSEN, who did not have any identification in his possession, stated that he was wanted by the FBI for bank robberies.

5. On or about January 6, 2011, I participated in an interview of the defendant VICTOR LARSEN. After he was advised of his Miranda rights and agreed to speak to us, LARSEN admitted both orally and in writing to robbing the Chase Bank on December 20, 2010. LARSEN stated that he had his hand in his pocket to look like he had a gun, but said that he did not have a gun. In addition, LARSEN also admitted to robbing five other banks in Queens between December 7, 2010 and December 24, 2010. The investigation into those robberies is pending. The deposits of Chase Bank are insured by the Federal Deposit Insurance Corporation.

WHEREFORE, your deponent respectfully requests that the defendant VICTOR LARSEN be dealt with according to law.



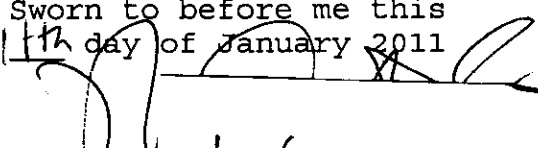
CLARENCE EVERETT

Detective

New York City Police Department

FBI/NYCPD Joint Robbery Task Force

Sworn to before me this
11th day of January 2011



UNITED STATES
EASTERN

s/ 60

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